

IN THE UNITED STATE DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

X

Juan Sejas :
:
Plaintiff, :
: Civil Action No. 22-CV-9358 (JPO)

- v. - :

UNITED STATES ATTORNEY'S OFFICE :
86 Chambers St. New York, NY 10007 :
Defendant. :

X

EMERGENCY MOTION: REQUEST TO SEAL THE CASE AND WARRANTIES

Juan Sejas ("Plaintiff") brings this action against the Defendant U.S. Department of Justice ("Defendant"). As grounds for the Emergency Motion therefore, Plaintiff alleges as follows:

JURISDICTION AND VENUE

The Court has jurisdiction over this action pursuant to Global Magnitsky Human Rights Accountability Act 22 U.S.C. 2656 note - Public Law 114-328 International Emergency Economic Powers Act (IEEPA), 50 U.S.C. §§ 1701-1706 Code of Federal Regulations 31 CFR Part 583

PARTIES

1. Juan Sejas is a US citizen and is a member of many organizations that defend the Human Rights and promote education. Plaintiff seeks to promote transparency, accountability, and

integrity in government and fidelity to the rule of law.

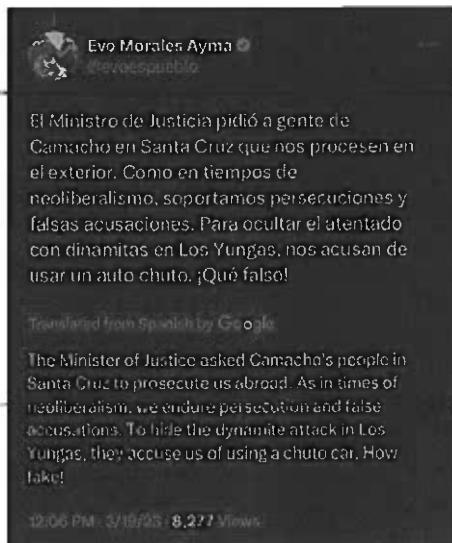
2. **The U.S. Department of Justice is an agency of the United States Government.**

“The mission of the U.S. Department of State is twofold. Also known as the State Department, this institution represents American foreign policy abroad. The State Department also advances the interests and security of the American people. The safety and security of the United States and its citizens are always at the center of the State Department’s work. Everything the State Department does reflects a commitment to protecting and promoting the American way of life. The State Department achieves this broad goal through diplomacy, advocacy, and assistance. Counterparts include foreign countries, international organizations, and non-government organizations.”

Defendant is headquartered at Room 115 LOC Building, Washington, DC 20530-0001.

STATEMENT OF FACTS

2. Plaintiff has been requested to proceed as John Doe because we are dealing with a very dangerous criminal organization.
3. “By order dated November 18, 2022, the Court construed Plaintiff’s declaration, filed with the complaint, as including a motion to proceed anonymously, and denied the motion.”
4. On march 19th,2023 Former President Evo Morales mention on a twitter: “that somebody is looking to prosecute him abroad”



5. But the most alarming notice mentioned for the Minister of Justice Ivan Lima on March 18,2023, reported on the death of the protected witness in the Bolivian Highway Administration (ABC) case, due to a traffic accident in Miami, United States (USA).
6. On January 2022, deputy Arce denounced corruption. Nine people were denounced for allegedly having collected a millionaire bribe from the Chinese company ‘Harbour Engineering Company, Chec,’ to which they awarded the construction of the Sucre-Yamparáez double road. The president of the Bolivian Highway Administration (ABC), Henry Nina, heads the group of defendants and the case even splashes on the Minister of Public Works, Édgar Montaño, through his former legal advisor.
7. On March 18,2023 the deputy of the Movement Towards Socialism (MAS), Héctor Arce, blamed the Minister of Justice, Iván Lima, for the traffic accident suffered by the protected witness and that led to his death. In addition, the legislator said that the State authority must explain where the "millionaire bribe" denounced in the case of the Bolivian Highway Administration (ABC) appeared. (1)

1. <https://www.paginasiete.bo/nacional/diputado-arce-culpa-a-lima-por-muerte-del-testigo-protegido-y-le-pregunta-de-donde-hizo-aparecer-la-coima-millonaria-CL6836242>

8. Plaintiff requests to the court order an investigation to the U.S. Department of Justice on this traffic accident suffered by the protected witness and led to his death in Miami, USA.
9. Plaintiff requests to the court, if there are signs of participation of this criminal organization in this death, the Court will provide the necessary protection and guarantees to the plaintiff, and the provisions that this Court deems necessary and warrants.
10. Plaintiff requests to the court, seal the case because his name will be exposed to this criminal organization.

WHEREFORE, Plaintiff respectfully requests that the Court: (1) order Defendant to conduct an investigation and the circumstances of the death in Miami of the protected witness (2) If there are signs of participation of this criminal organization in this death, the Court will provide the necessary protection and guarantees to the plaintiff, and the provisions that this Court deems necessary and warrants (3) Plaintiff requests to the court, seal the case because his name will be exposed to this criminal organization

Dated: March 21,2023

Respectfully submitted



Juan Sejas

Plaintiff